

Exhibit 3

Ezra Rosenberg

From: Rosenberg, Ezra
Sent: Wednesday, July 16, 2014 11:24 AM
To: Brandy_Cortez@txs.uscourts.gov
Cc: anna.baldwin@usdoj.gov; EXT mvandalen; john.scott@texasattorneygeneral.gov; EXT Ryan Haygood; EXT Chad Dunn; Westfall, Elizabeth (CRT); Whitley, David
Subject: RE: Veasey

Good morning, Ms. Cortez. An update: The parties conferred again and are optimistic that they will be able to reach an agreement on this motion. We hope to have this resolved within the next 24 hours, and will advise the Court as soon as there is resolution. Please let me know if you have any questions. Thanks. – Ezra Rosenberg

From: Rosenberg, Ezra
Sent: Tuesday, July 15, 2014 5:34 PM
To: 'Brandy_Cortez@txs.uscourts.gov'
Cc: anna.baldwin@usdoj.gov; EXT mvandalen; john.scott@texasattorneygeneral.gov; EXT Ryan Haygood; EXT Chad Dunn; Westfall, Elizabeth (CRT); 'Whitley, David'
Subject: RE: Veasey

Ms. Cortez – Sorry for the shortness of my note a few minutes ago, but all parties were on the phone discussing this motion. We have set another call for 10 am CT/11 am ET tomorrow to follow-up on this discussion, and will report back to you after that call. Thank you. – Ezra Rosenberg

From: Brandy_Cortez@txs.uscourts.gov [mailto:Brandy_Cortez@txs.uscourts.gov]
Sent: Tuesday, July 15, 2014 5:15 PM
To: EXT Chad Dunn; anna.baldwin@usdoj.gov; Rosenberg, Ezra; EXT mvandalen; john.scott@texasattorneygeneral.gov; EXT Ryan Haygood
Subject: Veasey

Is this opposed by Plaintiffs?

07/14/2014



402



MOTION for Extension of Time to File Expert Rebuttal by Steve McGraw, Rick Perry, State Of Texas, John Steen, filed. Motion Docket Date 8/4/2014. (Attachments: # (1) Proposed Order Proposed Order Granting Motion for Extension of Time)(Scott, John) (Entered: 2014-07-14)

Thank you,

Brandy Cortez
Case Manager for
Judge Nelva Gonzales Ramos
U.S. District Judge
Corpus Christi Division-Southern District of Texas
361-693-6457

Ezra Rosenberg

From: Rosenberg, Ezra
Sent: Tuesday, July 22, 2014 5:29 PM
To: Brandy_Cortez@txs.uscourts.gov
Cc: Scott, John; Clay, Reed; Whitley, David; Wolf, Lindsey; Ried, Lisa; Berman, Robert (CRT); Westfall, Elizabeth (CRT); Maranzano, Jennifer (CRT); Baldwin, Anna (CRT); Freeman, Daniel (CRT); Gear, Bruce (CRT); All Corpus Christi Section 2 Case Group

Dear Ms. Cortez: After discussions with all parties, following are the items the parties ask that the Court address on Thursday's call. Thanks. – Ezra Rosenberg

- United States Motion for a Protective Order from Defendants' Rule 30(b)(6) Notice of Deposition to the United States of America (ECF No. 276)
- United States Motion for a Protective Order from Defendants' Rule 30(b)(6) Notice of Deposition to the Department of Justice's Office of the Inspector General (ECF No. 355)
- Defendants Motion for Protection on the Amended Notice of Deposition of Coby Shorter (ECF No. 335), opposed by the United States (ECF No. 401) (Currently the subject on negotiations between the parties – the parties will notify the Court if resolved in advance of the hearing.)
- Texas Young Voter Motion to compel re Mitchell depo (ECF 395)
- Texas motion to compel (ECF 343) (Currently the subject on negotiations between the parties – the parties will notify the Court if resolved in advance of the hearing.)
- Veasey Motion to compel answers to interrogatories (ECF 420) – This motion was recently filed. Movants seek a short briefing schedule.
- Third party legislators' motion to compel (ECF 348, 386)
- The parties are discussing other issues relating to trial protocol, which, may lead to a brief discussion on a consent addition to the pretrial schedule.
- The State will be filing an Advisory, which it will request the Court to address. The plaintiffs have not seen the Advisory, so cannot state their position.

Ezra Rosenberg

From: Scott, John <john.scott@texasattorneygeneral.gov>
Sent: Friday, July 25, 2014 4:11 PM
To: Rosenberg, Ezra
Subject: Re: Veasey v. Perry: discovery issue

Ezra-

Your words of wisdom were simply heeded. Thanks. I hope you have a great weekend.

John

Sent from my iPhone

> On Jul 25, 2014, at 3:08 PM, "Rosenberg, Ezra" <ezra.rosenberg@dechert.com> wrote:

>

> John - thanks for your cooperation. Have a good weekend. - Ezra.

>

> Sent from my iPhone

>

> On Jul 25, 2014, at 2:52 PM, "Scott, John"

<john.scott@texasattorneygeneral.gov<mailto:john.scott@texasattorneygeneral.gov>> wrote:

>

> Ms. Cortez-

>

> The parties have conferred and the issues appear to be resolved. Thank you and have a great weekend.

>

> John

>

> From: Brandy_Cortez@txs.uscourts.gov<mailto:Brandy_Cortez@txs.uscourts.gov>

[mailto:Brandy_Cortez@txs.uscourts.gov]

> Sent: Friday, July 25, 2014 11:41 AM

> To: Baldwin, Anna (CRT)

> Cc: All Corpus Christi Section 2 Case Group; Shapiro, Avner (CRT); Heard, Bradley (CRT); Gear, Bruce (CRT); Freeman, Daniel (CRT); Whitley, David; Westfall, Elizabeth (CRT); Rosenberg, Ezra; Maranzano, Jennifer (CRT); Scott, John; Clay, Reed; Dellheim, Richard (CRT); Berman, Robert (CRT); King, Ryan (CRT)

> Subject: RE: Veasey v. Perry: discovery issue

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> The hearing at 1:30 will be cancelled until I hear from you all.

>

> Thank you,

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> Brandy Cortez

> Case Manager for

> Judge Nelva Gonzales Ramos

> U.S. District Judge

> Corpus Christi Division-Southern District of Texas

> 361-693-6457

>

>
>
>
> From: "Baldwin, Anna (CRT)" <Anna.Baldwin@usdoj.gov<mailto:Anna.Baldwin@usdoj.gov>>
> To: "Scott, John" <john.scott@texasattorneygeneral.gov<mailto:john.scott@texasattorneygeneral.gov>>, "Rosenberg, Ezra" <ezra.rosenberg@dechert.com<mailto:ezra.rosenberg@dechert.com>>, "Brandy_Cortez@txs.uscourts.gov<mailto:Brandy_Cortez@txs.uscourts.gov>" <Brandy_Cortez@txs.uscourts.gov<mailto:Brandy_Cortez@txs.uscourts.gov>>
> Cc: All Corpus Christi Section 2 Case Group <AllCorpusChristiSection2CaseGroup@dechert.com<mailto:AllCorpusChristiSection2CaseGroup@dechert.com>>, "Shapiro, Avner (CRT)" <Avner.Shapiro@usdoj.gov<mailto:Avner.Shapiro@usdoj.gov>>, "Heard, Bradley (CRT)" <Bradley.Heard@usdoj.gov<mailto:Bradley.Heard@usdoj.gov>>, "Gear, Bruce (CRT)" <Bruce.Gear@usdoj.gov<mailto:Bruce.Gear@usdoj.gov>>, "Freeman, Daniel (CRT)" <Daniel.Freeman@usdoj.gov<mailto:Daniel.Freeman@usdoj.gov>>, "Whitley, David" <david.whitley@texasattorneygeneral.gov<mailto:david.whitley@texasattorneygeneral.gov>>, "Westfall, Elizabeth (CRT)" <Elizabeth.Westfall@usdoj.gov<mailto:Elizabeth.Westfall@usdoj.gov>>, "Maranzano, Jennifer (CRT)" <Jennifer.Maranzano@usdoj.gov<mailto:Jennifer.Maranzano@usdoj.gov>>, "Clay, Reed" <Reed.Clay@texasattorneygeneral.gov<mailto:Reed.Clay@texasattorneygeneral.gov>>, "Dellheim, Richard (CRT)" <Richard.Dellheim@usdoj.gov<mailto:Richard.Dellheim@usdoj.gov>>, "Berman, Robert (CRT)" <Robert.Berman@usdoj.gov<mailto:Robert.Berman@usdoj.gov>>, "King, Ryan (CRT)" <Ryan.King@usdoj.gov<mailto:Ryan.King@usdoj.gov>>
> Date: 07/25/2014 11:38 AM
> Subject: RE: Veasey v. Perry: discovery issue

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> Ms. Cortez,
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> We had requested that Defendants confer with us at 1pm. If the issues are resolved, we will certainly inform the Court. In the event that the issues are not resolved, we will inform the Court to request a hearing be set.

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> Sincerely,
> Anna Baldwin

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> From: Scott, John [mailto:john.scott@texasattorneygeneral.gov]
> Sent: Friday, July 25, 2014 12:29 PM
> To: Rosenberg, Ezra; Brandy_Cortez@txs.uscourts.gov<mailto:Brandy_Cortez@txs.uscourts.gov>; Baldwin, Anna (CRT)
> Cc: All Corpus Christi Section 2 Case Group; Shapiro, Avner (CRT); Heard, Bradley (CRT); Gear, Bruce (CRT); Freeman, Daniel (CRT); Whitley, David; Westfall, Elizabeth (CRT); Maranzano, Jennifer (CRT); Clay, Reed; Dellheim, Richard (CRT); Berman, Robert (CRT); King, Ryan (CRT)
> Subject: RE: Veasey v. Perry: discovery issue

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> Ms. Cortez,
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> Mr. Rosenberg is partly right. There is, at this point, at least one sticking point which likely would not be resolved by conferring: whether DPS's deposition should be done on written questions. However, we believe that having a hearing with the Court before conferring on the twenty-three (23) broad topics, many of which may implicate attorney-client privilege and work-product, would be a waste of the Court's time, as we would likely need yet another hearing to resolve disagreements about the topics to be covered in the deposition (regardless of its form).

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> John
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> From: Rosenberg, Ezra [mailto:ezra.rosenberg@dechert.com]
> Sent: Friday, July 25, 2014 11:23 AM
> To: Scott, John; Brandy_Cortez@txs.uscourts.gov<mailto:Brandy_Cortez@txs.uscourts.gov>; Baldwin, Anna (CRT)
> Cc: All Corpus Christi Section 2 Case Group; Shapiro, Avner (CRT); Heard, Bradley (CRT); Gear, Bruce (CRT); Freeman, Daniel (CRT); Whitley, David; Westfall, Elizabeth (CRT); Maranzano, Jennifer (CRT); Clay, Reed; Dellheim, Richard (CRT); Berman, Robert (CRT); King, Ryan (CRT)
> Subject: RE: Veasey v. Perry: discovery issue
>
> Ms. Cortez – As I understand it, there is one major issue as to which conferring would not be productive: Texas's unilateral refusal to produce a live witness. As to the other issue – the scope of the 30(b)(6) -- the parties are willing to confer at anytime between now and 1:30, to see if the issues as to scope can be narrowed by then. So, with that understanding, is it possible to hold the 1:30 date, given the urgency of the situation.
>
> From: Scott, John [mailto:john.scott@texasattorneygeneral.gov]
> Sent: Friday, July 25, 2014 12:18 PM
> To: Brandy_Cortez@txs.uscourts.gov<mailto:Brandy_Cortez@txs.uscourts.gov>; Baldwin, Anna (CRT)
> Cc: All Corpus Christi Section 2 Case Group; Shapiro, Avner (CRT); Heard, Bradley (CRT); Gear, Bruce (CRT); Freeman, Daniel (CRT); Whitley, David; Westfall, Elizabeth (CRT); Maranzano, Jennifer (CRT); Clay, Reed; Dellheim, Richard (CRT); Berman, Robert (CRT); King, Ryan (CRT)
> Subject: RE: Veasey v. Perry: discovery issue
>
> We have not yet conferred.
>
> From: Brandy_Cortez@txs.uscourts.gov<mailto:Brandy_Cortez@txs.uscourts.gov>
[mailto:Brandy_Cortez@txs.uscourts.gov]
> Sent: Friday, July 25, 2014 11:17 AM
> To: Baldwin, Anna (CRT)
> Cc: All Corpus Christi Section 2 Case Group; Shapiro, Avner (CRT); Heard, Bradley (CRT); Gear, Bruce (CRT); Freeman, Daniel (CRT); Whitley, David; Westfall, Elizabeth (CRT); Maranzano, Jennifer (CRT); Scott, John; Clay, Reed; Dellheim, Richard (CRT); Berman, Robert (CRT); King, Ryan (CRT)
> Subject: RE: Veasey v. Perry: discovery issue
>
> Counsel,
>
> Have you all conferred on this issue? I do not want to get parties on the phone if you all have not conferred.
>
> Thank you,
>
> Brandy Cortez
> Case Manager for
> Judge Nelva Gonzales Ramos
> U.S. District Judge
> Corpus Christi Division-Southern District of Texas
> 361-693-6457
>
>
>
>
> From: "Baldwin, Anna (CRT)" <Anna.Baldwin@usdoj.gov<mailto:Anna.Baldwin@usdoj.gov>>

> To: "Scott, John" <john.scott@texasattorneygeneral.gov<mailto:john.scott@texasattorneygeneral.gov>>, "Brandy_Cortez@txs.uscourts.gov<mailto:Brandy_Cortez@txs.uscourts.gov>" <Brandy_Cortez@txs.uscourts.gov<mailto:Brandy_Cortez@txs.uscourts.gov>>
> Cc: All Corpus Christi Section 2 Case Group <AllCorpusChristiSection2CaseGroup@dechert.com<mailto:AllCorpusChristiSection2CaseGroup@dechert.com>>, "Shapiro, Avner (CRT)" <Avner.Shapiro@usdoj.gov<mailto:Avner.Shapiro@usdoj.gov>>, "Heard, Bradley (CRT)" <Bradley.Heard@usdoj.gov<mailto:Bradley.Heard@usdoj.gov>>, "Gear, Bruce (CRT)" <Bruce.Gear@usdoj.gov<mailto:Bruce.Gear@usdoj.gov>>, "Freeman, Daniel (CRT)" <Daniel.Freeman@usdoj.gov<mailto:Daniel.Freeman@usdoj.gov>>, "Whitley, David" <david.whitley@texasattorneygeneral.gov<mailto:david.whitley@texasattorneygeneral.gov>>, "Westfall, Elizabeth (CRT)" <Elizabeth.Westfall@usdoj.gov<mailto:Elizabeth.Westfall@usdoj.gov>>, "Maranzano, Jennifer (CRT)" <Jennifer.Maranzano@usdoj.gov<mailto:Jennifer.Maranzano@usdoj.gov>>, "Clay, Reed" <Reed.Clay@texasattorneygeneral.gov<mailto:Reed.Clay@texasattorneygeneral.gov>>, "Dellheim, Richard (CRT)" <Richard.Dellheim@usdoj.gov<mailto:Richard.Dellheim@usdoj.gov>>, "Berman, Robert (CRT)" <Robert.Berman@usdoj.gov<mailto:Robert.Berman@usdoj.gov>>, "King, Ryan (CRT)" <Ryan.King@usdoj.gov<mailto:Ryan.King@usdoj.gov>>

> Date: 07/25/2014 11:12 AM

> Subject: RE: Veasey v. Perry: discovery issue

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> John,
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> Mr. Clay's email last evening took a unilateral position that no live witness would be produced. ("We will not be providing a DPS designee to testify on the topics you specified."). For that reason, and because of the urgency of resolving this issue, we sought the Court's assistance. Because Mr. Clay also stated that the Noticed topics were too broad, but that those deemed to relate to the programming errors at issue could be answered by a deposition on written questions, we sought—and still seek—to confer with Defendants on scope. We continue to think that would be productive.

>
> Anna
>
>

> From: Scott, John [mailto:john.scott@texasattorneygeneral.gov]

> Sent: Friday, July 25, 2014 12:01 PM

> To: Brandy_Cortez@txs.uscourts.gov<mailto:Brandy_Cortez@txs.uscourts.gov>; Baldwin, Anna (CRT)

> Cc: All Corpus Christi Section 2 Case Group; Shapiro, Avner (CRT); Heard, Bradley (CRT); Gear, Bruce (CRT); Freeman, Daniel (CRT); Whitley, David; Westfall, Elizabeth (CRT); Maranzano, Jennifer (CRT); Clay, Reed; Dellheim, Richard (CRT); Berman, Robert (CRT); King, Ryan (CRT)

> Subject: RE: Veasey v. Perry: discovery issue

>
> Anna-
>

> As you know last night Mr. Clay requested that we meet and confer regarding the topics to be covered and our request that the deposition be done on written questions pursuant to FRCP 31(a)(4). It was my understanding that you accepted the request to meet and confer and proposed such a conference at 1 pm today. Minutes later you requested a hearing from the Court that has since been set for 1:30. I am assuming that these subsequent actions mean you no longer wish to meet and confer. Please correct me if I am mistaken.

>

> John
>
> From: Brandy_Cortez@txs.uscourts.gov<mailto:Brandy_Cortez@txs.uscourts.gov>
[mailto:Brandy_Cortez@txs.uscourts.gov]
> Sent: Friday, July 25, 2014 10:46 AM
> To: Baldwin, Anna (CRT)
> Cc: All Corpus Christi Section 2 Case Group; Shapiro, Avner (CRT); Heard, Bradley (CRT); Gear, Bruce (CRT); Freeman,
Daniel (CRT); Whitley, David; Westfall, Elizabeth (CRT); Maranzano, Jennifer (CRT); Scott, John; Clay, Reed; Dellheim,
Richard (CRT); Berman, Robert (CRT); King, Ryan (CRT)
> Subject: Re: Veasey v. Perry: discovery issue
>
> Hearing will be set for 130pm today. Please forward this to all counsel.
>
> Thank you,
>
> Brandy Cortez
> Case Manager for
> Judge Nelva Gonzales Ramos
> U.S. District Judge
> Corpus Christi Division-Southern District of Texas
> 361-693-6457
>
>
>
>
>
> From: "Baldwin, Anna (CRT)" <Anna.Baldwin@usdoj.gov<mailto:Anna.Baldwin@usdoj.gov>>
> To: "Brandy_Cortez@txs.uscourts.gov<mailto:Brandy_Cortez@txs.uscourts.gov>"
<Brandy_Cortez@txs.uscourts.gov<mailto:Brandy_Cortez@txs.uscourts.gov>>
> Cc: "Clay, Reed" <Reed.Clay@texasattorneygeneral.gov<mailto:Reed.Clay@texasattorneygeneral.gov>>, "Scott,
John" <john.scott@texasattorneygeneral.gov<mailto:john.scott@texasattorneygeneral.gov>>, "Whitley, David"
<david.whitley@texasattorneygeneral.gov<mailto:david.whitley@texasattorneygeneral.gov>>, "All Corpus Christi
Section 2 Case Group"
<AllCorpusChristiSection2CaseGroup@dechert.com<mailto:AllCorpusChristiSection2CaseGroup@dechert.com>>,
"Berman, Robert (CRT)" <Robert.Berman@usdoj.gov<mailto:Robert.Berman@usdoj.gov>>, "Westfall, Elizabeth (CRT)"
<Elizabeth.Westfall@usdoj.gov<mailto:Elizabeth.Westfall@usdoj.gov>>, "Dellheim, Richard (CRT)"
<Richard.Dellheim@usdoj.gov<mailto:Richard.Dellheim@usdoj.gov>>, "Heard, Bradley (CRT)"
<Bradley.Heard@usdoj.gov<mailto:Bradley.Heard@usdoj.gov>>, "Freeman, Daniel (CRT)"
<Daniel.Freeman@usdoj.gov<mailto:Daniel.Freeman@usdoj.gov>>, "Maranzano, Jennifer (CRT)"
<Jennifer.Maranzano@usdoj.gov<mailto:Jennifer.Maranzano@usdoj.gov>>, "Gear, Bruce (CRT)"
<Bruce.Gear@usdoj.gov<mailto:Bruce.Gear@usdoj.gov>>, "Shapiro, Avner (CRT)"
<Avner.Shapiro@usdoj.gov<mailto:Avner.Shapiro@usdoj.gov>>, "King, Ryan (CRT)"
<Ryan.King@usdoj.gov<mailto:Ryan.King@usdoj.gov>>
> Date: 07/25/2014 10:19 AM
> Subject: Veasey v. Perry: discovery issue
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> _____
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> Ms. Cortez,

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> There is a discovery issue with which Plaintiffs seek the Court's immediate assistance.

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> At yesterday's hearing we discussed the fact that Defendants informed the Court and all parties just three days ago that the data produced in February from the Department of Public Safety was incomplete and that some 2.8 million records related to Texas driver licenses and personal identification cards should have been produced to the United States but were not. The Texas DPS data is a critical component of the database matching conducted to determine which Texas registered voters have a valid SB 14 photo ID. Months after the initial data production—and nearly a month after plaintiffs produced their expert reports relying on the DPS data produced—Defendants explained that they failed to produce all records of Texans who actually hold DPS driver licenses and personal IDs. Two days ago, Texas produced the 2.8 million records that it has stated were inadvertently excluded. From the time that the United States was informed of this problem, we've repeatedly informed Defendants that we would be seeking deposition testimony from DPS about these events. Deposition testimony is critical to understanding what the records are that DPS produced two days ago, why such records were not produced months ago, and the extent to which the 2.8 million late-produced records should be incorporated into any match/no-match analysis.

>

> As we discussed with the Court yesterday, the United States requested a hearing next Thursday so that we could discuss the impact of Defendants' production errors after reviewing the data file, and after taking a deposition. During the hearing yesterday, Defendants raised no objection to producing live witnesses. Subsequent to serving the attached Rule 30(b)(6) Notice to DPS yesterday, Mr. Clay informed the United States that DPS would not be producing a live witness on any topic. He also objected to the scope of the topics noticed. Plaintiffs have requested a time to speak with Defendants regarding any scope concerns, but we are seriously concerned about Defendants' refusal to produce a live witness.

>

> We respectfully request a brief conference with Court today or Monday to ensure that these issues are expeditiously resolved.

>

> Sincerely,

>

> Anna M. Baldwin

> Trial Attorney

> Voting Section, Civil Rights Division

> U.S. Department of Justice[attachment "Rule 30(b)(6) Notice to DPS.PDF" deleted by Brandy Cortez/TXSD/05/USCOURTS]

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> _____

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> This e-mail is from Dechert LLP, a law firm, and may contain information that is confidential or privileged. If you are not the intended recipient, do not read, copy or distribute the e-mail or any attachments. Instead, please notify the sender and delete the e-mail and any attachments. Thank you.

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> *****

> This e-mail is from Dechert LLP, a law firm, and may contain information that is confidential or privileged. If you are not the intended recipient, do not read, copy or distribute the e-mail or any attachments. Instead, please notify the sender and delete the e-mail and any attachments. Thank you.

Ezra Rosenberg

From: Rosenberg, Ezra
Sent: Tuesday, July 29, 2014 10:39 AM
To: Brandy_Cortez@txs.uscourts.gov
Cc: alondon@bishoplondon.com; anna.baldwin@usdoj.gov; beau.eccles@texasattorneygeneral.gov; EXT Chad Dunn; john.scott@texasattorneygeneral.gov; kerry.kircher@mail.house.gov; EXT mvandalen; EXT Ryan Haygood; EXT Rolando L. Rios
Subject: RE: Veasey

I think that would be preferable. Can we place it there now, and await word from DOJ and the State? Much appreciated. – Ezra Rosenberg

From: Brandy_Cortez@txs.uscourts.gov [mailto:Brandy_Cortez@txs.uscourts.gov]
Sent: Tuesday, July 29, 2014 10:38 AM
To: Rosenberg, Ezra
Cc: alondon@bishoplondon.com; anna.baldwin@usdoj.gov; beau.eccles@texasattorneygeneral.gov; EXT Chad Dunn; john.scott@texasattorneygeneral.gov; kerry.kircher@mail.house.gov; EXT mvandalen; EXT Ryan Haygood; EXT Rolando L. Rios
Subject: RE: Veasey

I can reset to 2pm on Wednesday if that would help.

Thank you,

Brandy Cortez
Case Manager for
Judge Nelva Gonzales Ramos
U.S. District Judge
Corpus Christi Division-Southern District of Texas
361-693-6457

From: "Rosenberg, Ezra" <ezra.rosenberg@dechert.com>
To: "Brandy_Cortez@txs.uscourts.gov" <Brandy_Cortez@txs.uscourts.gov>, EXT Chad Dunn <chad@brazilanddunn.com>, "anna.baldwin@usdoj.gov" <anna.baldwin@usdoj.gov>, EXT mvandalen <mvandalen@trla.org>, "john.scott@texasattorneygeneral.gov" <john.scott@texasattorneygeneral.gov>, EXT Ryan Haygood <rhaygood@naacpldf.org>, "EXT Rolando L. Rios" <rrios@rolandorioslaw.com>, "kerry.kircher@mail.house.gov" <kerry.kircher@mail.house.gov>, "alondon@bishoplondon.com" <alondon@bishoplondon.com>, "beau.eccles@texasattorneygeneral.gov" <beau.eccles@texasattorneygeneral.gov>
Date: 07/29/2014 09:23 AM
Subject: RE: Veasey

Thank you, Ms. Cortez. I haven't discussed this with DOJ yet (and they may be en route to Texas) or with Texas, but the main purpose of the hearing tomorrow was to see whether there is the need for additional action as a result of the delay in production of the DPS data base, and the parties have agreed to a Rule 30(b)(6) deposition to explore issues relating to that production tomorrow. Is it possible for the conference with the Court to be scheduled for either the end of the day on Wednesday or on Thursday? Thank you. – Ezra Rosenberg

From: Brandy_Cortez@txs.uscourts.gov [mailto:Brandy_Cortez@txs.uscourts.gov]
Sent: Tuesday, July 29, 2014 10:18 AM

To: EXT Chad Dunn; anna.baldwin@usdoj.gov; Rosenberg, Ezra; EXT mvandalen; john.scott@texasattorneygeneral.gov; EXT Ryan Haygood; EXT Rolando L. Rios; kerry.kircher@mail.house.gov; alondon@bishoplondon.com; beau.eccles@texasattorneygeneral.gov

Subject: Veasey

Good Morning Counsel,

The Court needs to move the status conference originally set for Thursday to tomorrow, Wednesday, at 10:00am.

Thank you,

Brandy Cortez
Case Manager for
Judge Nelva Gonzales Ramos
U.S. District Judge
Corpus Christi Division-Southern District of Texas
361-693-6457

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Ezra Rosenberg

From: Rosenberg, Ezra
Sent: Wednesday, July 30, 2014 1:24 PM
To: Scott, John; Whitley, David; Baldwin, Anna (CRT); Freeman, Daniel (CRT)
Cc: EXT Armand Derfner; EXT Mark Posner
Subject: Meet and Confer at 1 pm CT/2pm Et

John and David – Let's talk at 1 pm your time. Use this number:
866.214.4423
5161200#